

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS

**DERRICK WASHINGTON,**

*Plaintiff,*

v.

**MASSACHUSETTS DEPARTMENT OF  
CORRECTION, *et al.*,**

*Defendants.*

Case No. 1:23-cv-10063-MRG

**MOTION TO ADMIT KATHERINE ZHANG *PRO HAC VICE***

PLEASE TAKE NOTICE that, pursuant to Local Rule 83.5.3 of the Rules of this Court, Plaintiff moves for the admission of Katherine Zhang, *pro hac vice*, on the following grounds:

1. Katherine Zhang is admitted to practice and is in good standing before the State of New York. I have verified that Katherine Zhang has active membership and good standing in the New York bar by checking the website operated by the state. She has no current disciplinary actions pending against her and has never been disciplined by any bar.

2. Katherine Zhang has reviewed and is familiar with the Local Rules of this Court.

3. The undersigned, an attorney admitted to practice and in good standing before this Court, has appeared in this action.

4. Katherine Zhang's office address is 55 Hudson Yards, Floor 20, New York, NY 10001.

Dated: October 30, 2025

Respectfully submitted,

/s/ Benjamin P. Solomon-Schwartz

Benjamin P. Solomon-Schwartz (BBO # 688674)

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 30, 2025, a true and correct copy of the foregoing has been served on all counsel of record via this Court's CM/ECF electronic filing system.

Dated: October 30, 2025

/s/ Benjamin Solomon-Schwartz  
Benjamin P. Solomon-Schwartz